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Attorney for Debtor

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF CALIFORNIA**

KRYSTAL ANNE MEDINA,
Debtor.

Case No.: 17-05276-LT7

Adv. No.: 19-90065-LT

KRYSTAL ANNE MEDINA
Plaintiff

**PLAINTIFF'S RESPONSE TO
DEFENDANT'S EX PARTE
APPLICATION TO CONTINUE**

v.

National Collegiate Student Loan
Trust 2006-3

Date: February 6, 2020

Time: 11:00 AM

Defendant

Dept.: 3

Plaintiff, Krystal Anne Medina, hereby files this Response to Defendant's Ex Parte Application to Continue, filed at Docket 30, as follows.

Counsel for Plaintiff apologizes to Counsel for Defendant and the Court for his inability to meaningfully respond to the request for a stipulation. Counsel was out of town, with limited ability to communicate, from 10:00 AM January 23 to approximately midnight January 26, and other urgent personal and professional matters required attention.

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1 Plaintiff is informed and believes that Defendant NCSLT has been in possession
2 of all exhibits and information contained in Plaintiff's Opposition as a result of the
3 litigation in *Mata v. National Collegiate Student Loan Trust* 2006-1, et al. Bankr. CD
4 Cal. 18-ap-01089. As a result, Plaintiff is somewhat skeptical of Defendant's claim that
5 it would be "practically impossible... to analyze and respond to the Opposition within
6 the time to do so per code."

7 Plaintiff previously agreed to a 2 month extension requested by Defendant for the
8 preparation of Defendant's Summary Judgment Motion (See Docket 20). Defendant's
9 further request for an additional *six week* extension to respond is excessive and should
10 be denied. To the extent that the Court is inclined to grant an extension to Defendant,
11 Plaintiff requests permission to respond, and an identical amount of time to prepare said
12 response, per Local Rule 9013-6(c).

13 Plaintiff requests that discovery deadlines be extended commensurate with any
14 continued hearing on this matter.

15
16 Date: 1/28/2020

/s/ Christopher R. Bush

Christopher R. Bush, Attorney for Plaintiff